

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF VERMONT**

IN RE:	)	
	)	
OPOSSUM KINGDOM, LLC	)	Case No. 26-10167-hzc
	)	Chapter 7 Case
Debtor.	)	

IN RE:	)	
	)	
CHESTER HARDWARE & MERCANTILE, LLC	)	Case No. 26-10168-hzc
	)	Chapter 7 Case
Debtor.	)	

NOTICE OF MOTION ON DEFAULT PROCEDURE ON TRUSTEES' MOTION FOR ENTRY OF AN ORDER (I) APPROVING PROPOSED SALE OF ASSETS OF DEBTOR, OPOSSUM KINGDOM, LLC, REAL ESTATE LOCATED AT 21 MAIN ST., CHESTER, VERMONT; AND SALE OF MACHINERY, EQUIPMENT, INVENTORY, PERSONAL PROPERTY, INTANGIBLES, RECORDS AND OTHER ASSETS, LOCATED GENERALLY AT DEBTOR, CHESTER HARDWARE & MERCANTILE, LLC'S PLACE OF BUSINESS, TO ADAM RAWSON & JAIMIE RAWSON, AS PURCHASER, FREE AND CLEAR OF ALL LIENS, CLAIMS, INTERESTS AND ENCUMBRANCES PURSUANT TO 11 U.S.C. SECTIONS 105 AND 363(B), (F) AND (M), WITH SUCH ENCUMBRANCES TO ATTACH TO SALE PROCEEDS, AND (II) APPROVING THE TERMS AND CONDITIONS OF PROPOSED SALE TO PURCHASER FOR THE NEGOTIATED SUM OF FIVE HUNDRED EIGHTY SEVEN THOUSAND TWO HUNDRED AND 00/100 (\$587,200.00) DOLLARS OR GREATER AMOUNT PURSUANT TO THE PURCHASE AND SALE AGREEMENT AND SALE ORDER

Personal property and Real Property SPAN #144-045-10193

21 Main St., Chester, Vermon

Raymond J. Obuchowski, the chapter 7 trustee for the estate of Opossum Kingdom, LLC ("Trustee Obuchowski"), and Paul A. Levine, the chapter 7 trustee for the bankruptcy estate of Chester Hardware & Mercantile, LLC ("Trustee Levine") requested the entry of an Order: (i) authorizing and for approval of a sale of substantially all of the assets of the Opossum Kingdom, LLC¹ a Vermont limited liability company, ("OPK"); and, Chester Hardware &

¹ Case No. 26-10167.

Mercantile, LLC² (“CH&M”), a Vermont limited liability company, (collectively the “Estates” or “Debtors”), being the real estate located at 21 Main St., Chester, Vermont, to Adam Rawson & Jaimie Rawson, (“Rawson” or “Purchaser”), together with the machinery, equipment, inventory, personal property, intangibles, records and other assets, which are generally located at the former principal place of business of CHM at 21 Main St., Chester, Vermont, free and clear of all liens, claims, interests and Encumbrances pursuant to 11 U.S.C. Sections 105, 363(b) & (f), with such liens, claims, interests and Encumbrances to attach to the sale proceeds; and (ii) approving the terms and conditions of the proposed sale to Purchaser for a negotiated sum of not less than Five Hundred Eighty Seven Thousand Two Hundred and 00/100 Dollars (\$587,200) or at such higher amount as may be determined by through bankruptcy sale procedures being the (“Purchase Price”) pursuant to the terms of a Purchase and Sale Agreement (“PSA”).

IF YOU OPPOSE THE MOTION OR WISH TO MAKE A HIGHER OR BETTER COUNTER-OFFER, you are encouraged to file a written opposition or counter-offer with the Clerk of Court, on or before 4:00 p.m. on Friday, October 16, 2026. If you file a written opposition or counteroffer, a copy must also be served on the Case Trustees as the Moving Party, the proposed Purchaser, Debtor's counsel, the United States Trustee. Addresses for those parties are set forth below.

ANY HIGHER OR BETTER COUNTER OFFER SHALL BEGIN AT \$597,200 WITH ALL FOLLOWING OFFERS TO BE MADE BEFORE THE COURT BY INCREMENTS OF NOT LESS THAN \$10,000.00. All higher and better offers must include satisfactory evidence to the Trustees, in their sole discretion, of the financial capability to close. All higher and better offers, if such offer is not the Successful offer approved by the Court, will remain irrevocable until two (2) business days after closing of the Sale and remains open until that time as a “back-up bid” at the last price and terms presented to the Court.

IF A TIMELY RESPONSE IN OPPOSITION TO THE SALE MOTION IS FILED, the Court will hold a hearing on the Sale Motion and the response at 11:00 a.m. on October 23, 2026 via Zoom, i.e., at the Court's "audio-video / zoom location; and the Courtroom Deputy shall provide the zoom information to all key parties (as identified by the Trustee). Anyone else who

wishes to participate in this hearing may contact the Courtroom Deputy by email at VTB_CRD@vtb.uscourts.gov OR BY TELEPHONE AT (802) 657-6400.

IF NO RESPONSE IN OPPOSITION OR HIGHER AND BETTER OFFER IS TIMELY FILED, the Court **may** deem the matter unopposed and grant the motion without further hearing. If an order has not been entered before the hearing date, the hearing will proceed and the Movant must appear.

DATED at Royalton, Vermont: Friday, September 18, 2026.

By: /s/ Raymond J. Obuchowski
Raymond J. Obuchowski, Esq.
Chapter 7 Trustee
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DATED at Albany, New York: September 18, 2026.

By: /s/ Paul A. Levine
Paul A. Levine, Esq.
Chapter 7 Trustee
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PARTIES TO BE NOTICED:

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